

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

**IN RE: SUBPOENAS TO TIKTOK FOR INFORMATION FROM
SOCIAL MEDIA CONTENT CREATORS 1–7,**

REDACTED VERSION

JANE DOE 1 and JANE DOE 2,

Movants,

v.

MOTION TO SEAL

Pursuant to Federal Rule of Civil Procedure 5.2(d) and the Court’s Individual Practices, Movants Jane Doe 1 and Jane Doe 2 respectfully move this Court for an order permitting the filing under seal of unredacted versions of:

- Their Motion to Quash the Subpoena to TikTok;
- Their Motion to Proceed Anonymously;
- Declarations in Support of the Motions;
- Exhibits containing identifying or sensitive personal information.

Movants bring these motions in connection with a third-party subpoena issued in the above-captioned matter, in which they are not parties. These filings contain private and identifying information, including Movants’ legal names and personal details, which, if publicly disclosed, would pose a serious risk of harassment, doxxing, and potential harm.

The requested sealing is narrowly tailored to protect the identities of Movants while preserving public access to the substance of the filings. See *Lugosch v. Pyramid Co. of Onondaga*, 435 F.3d 110 (2d Cir. 2006). Sealing is also warranted where disclosure of identities would chill the exercise of First Amendment rights or subject individuals to retaliation. See *Doe v. City of New York*, 201 F.R.D. 100 (S.D.N.Y. 2001).

Movants respectfully request that the Court grant this motion and permit them to file unredacted documents under seal.

Respectfully submitted,

Dated: July 27, 2025

/s/ Jane Doe 1

/s/ Jane Doe 2
Pro Se Movants

PROPOSED ORDER TO SEAL

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

**IN RE SUBPOENA TO TIKTOK IN CONNECTION WITH
LIVELY V. BALDONI, ET AL., CASE NO. 1:24-CV-01234-LJL**

[PROPOSED] ORDER GRANTING MOTION TO SEAL

Upon consideration of the Motion to Seal filed by Movants Jane Doe 1 and Jane Doe 2, and good cause appearing therefor, IT IS HEREBY ORDERED that:

Movants are granted leave to file the unredacted versions of the following documents under seal:

- Motion to Quash the Subpoena to TikTok
- Motion to Proceed Anonymously
- Supporting Declarations and Exhibits

The Clerk of Court is directed to maintain these documents under seal until further order of the Court.

SO ORDERED.

Dated: _____, 2025
New York, New York

Hon. Lewis J. Liman
United States District Judge